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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

AARON J. GRAY,  
a/k/a "A.R.,"  
AJA M. EASLEY, and  
KENNETH A. MERTZ

**CRIMINAL COMPLAINT**

Mag. No. 16-5002

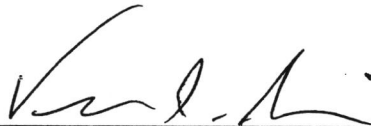
I, Vernon I. Addison, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Special Agent Vernon I. Addison  
Federal Bureau of Investigation

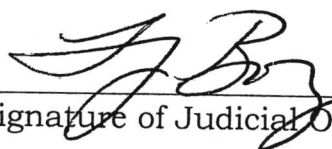
Sworn to before me and subscribed in my presence,  
January 7, 2016  
Trenton, New Jersey

HONORABLE TONIANNE J. BONGIOVANNI  
UNITED STATES MAGISTRATE JUDGE

**RECEIVED**

**JAN 7 - 2016**

TONIANNE J. BONGIOVANNI  
U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

## **ATTACHMENT A**

### **Count One**

Between on or about March 2, 2015 and March 3, 2015, in Camden County and Burlington County, in the District of New Jersey, and elsewhere, the defendants,

AARON J. GRAY, a/k/a "A.R.,"  
AJA M. EASLEY, and  
KENNETH A. MERTZ,

did knowingly and intentionally conspire and agree with each other to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, in and affecting interstate and foreign commerce, "Victim A," and to benefit financially and by receipt of anything of value from participation in a venture which engaged in such acts, knowing, and in reckless disregard of the fact, that "Victim A" had not attained the age of 18 years and would be caused to engage in a commercial sex act, contrary to Title 18, United States Code, Section 1591(a).

In violation of Title 18, United States Code, Section 1594(c).

### **Count Two**

On or about March 3, 2015, in Burlington County, in the District of New Jersey, and elsewhere, the defendants,

AARON J. GRAY, a/k/a "A.R.,"  
AJA M. EASLEY, and  
KENNETH A. MERTZ,

did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, in and affecting interstate and foreign commerce, "Victim A," and did benefit financially and by receipt of anything of value from participation in a venture which engaged in such acts, knowing, and in reckless disregard of the fact, that "Victim A" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 2.

Count Three

On or about March 3, 2015, in Camden County and Burlington County, in the District of New Jersey, and elsewhere, the defendant,

AARON J. GRAY, a/k/a "A.R.,"

having been convicted in the Superior Court of New Jersey, Camden County, of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce, a firearm, namely, a Glock .40 caliber pistol, model 27, bearing serial number NWU278, loaded with 12 rounds of ball ammunition and one round of hollow-point ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

## **ATTACHMENT B**

I, Vernon I. Addison, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

### **Background**

1. At all times relevant to this complaint, defendant AARON J. GRAY, a/k/a "A.R.," was a resident of Camden, New Jersey. On or about June 30, 2006, GRAY was convicted in the Superior Court of New Jersey, Camden County, of a crime punishable by a term of imprisonment exceeding one year, to wit, distributing, dispensing, and/or possessing with intent to distribute a controlled dangerous substance on or near school property, in violation of N.J.S.A. 2C:35-7.

2. At all times relevant to this complaint, defendant AJA M. EASLEY was a resident of Camden, New Jersey.

3. At all times relevant to this complaint, defendant KENNETH A. MERTZ was a resident of Collingswood, New Jersey. (GRAY, EASLEY, and MERTZ are referred to collectively herein as "the defendants.")

4. At all times relevant to this complaint, "Victim A" was an individual who had not attained the age of 18 years. At all times relevant to this complaint, the defendants had a reasonable opportunity to observe Victim A, and knew, or recklessly disregarded the fact, that Victim A had not attained the age of 18 years.

### **The Defendants' Sex Trafficking of Victim A**

March 2, 2015

5. Victim A met EASLEY in or about early 2015, when Victim A had been dating an uncharged individual ("UI").

6. On or about March 2, 2015, EASLEY communicated with Victim A using a social media website ("Website 1"), whose servers are located outside the State of New Jersey. During the communication on Website 1, EASLEY told Victim A, among other things, that she was "worried about" Victim A, and

offered to provide Victim A with "money," "[f]ood," "[c]lothing," and/or "[s]helter." EASLEY also referred to a domestic violence incident during which the UI had assaulted Victim A, writing that she (EASLEY) "didn't like what happened" to Victim A. EASLEY also wrote that she felt as though she had "bonded" with Victim A as a result of the assault. EASLEY and Victim A agreed to meet in or around Camden, New Jersey so that EASLEY could provide Victim A money. EASLEY provided the number to her cellular telephone ("EASLEY's Cell Phone") to Victim A, and wrote to Victim A, "I hope your ok."<sup>1</sup>

7. Later that day, EASLEY met Victim A at the Camden Transportation Center ("CTC") in or around Camden, New Jersey. While at the CTC, EASLEY informed Victim A about a dating website ("Website 2") and that Victim A could make money through Website 2 by going on "dates." Based on my training and experience, I am aware that Website 2 often is used to advertise, solicit, and coordinate acts of prostitution.

8. Victim A and EASLEY traveled to a residence in or around Camden, New Jersey, where they met GRAY and MERTZ. MERTZ drove Victim A, GRAY, and EASLEY to a store in MERTZ's vehicle, and then to a motel ("Motel 1") located in or around Cherry Hill, New Jersey. MERTZ rented a room at Motel 1.

9. Once inside the motel room, GRAY and EASLEY attempted to convince Victim A to engage in commercial sex acts. Using EASLEY's Cell Phone, EASLEY took photographs of Victim A, several of which depicted Victim A wearing only her underwear and in sexually provocative poses.

10. Using EASLEY's Cell Phone, EASLEY created and paid for an advertisement (the "Advertisement") on Website 2, whose servers are located outside the State of New Jersey, that advertised Victim A for commercial sex acts. Using her cell phone, EASLEY uploaded the photographs to the Advertisement within a section entitled "South Jersey Escorts." The Advertisement contained a heading that listed the number of EASLEY's Cell Phone and read: "playful kitten 60\$ special INCALLS ONLY - 21." The Advertisement also contained a solicitation that read: "Im Very Tender But I Can Also Be Rough .. I Aim To Please To Know Me Is To Love Me .. Aquafina Water - Slippery INTERESTED?GIVE ME A CALL [. . .] SERIOUS INQUIRIES ONLY." The Advertisement was published and disseminated via the internet, in and affecting interstate and foreign commerce.

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<sup>1</sup> Typographical or grammatical errors contained in written communications that are quoted in this complaint are accurate depictions of those communications, as they originally appeared.

11. After the Advertisement was established, EASLEY used her cell phone to negotiate with individuals who responded to the Advertisement regarding the price for commercial sex acts, advise them of the location of Motel 1, and direct them upon their arrival at Motel 1. During these communications, EASLEY purported to be Victim A.

12. For example, one individual responding to the Advertisement sent a text message to EASLEY's Cell Phone that read: "Hey sexy." Using EASLEY's Cell Phone, EASLEY responded to the individual with a text message that read: "Hi babe." The individual then sent a text message to EASLEY's Cell Phone that read: "Can you do \$40?" EASLEY responded with a text message that read: "No."

13. Using EASLEY's Cell Phone, EASLEY also engaged in the following text message conversation with another individual who responded to the Advertisement:

Responding individual:	Rt 70 or 73 hn
EASLEY:	No baby rt. 38 <sup>2</sup>
Responding individual:	Ok thanks
EASLEY:	Ok about how long sweetie?
Responding individual:	10 mn
Responding individual:	There
EASLEY:	Ok give me like 15 mins to freshen up for you

14. Before any individuals responding to the Advertisement arrived at Motel 1, GRAY instructed Victim A, among other things, that Victim A had to listen to him and that everything would go as planned. GRAY and EASLEY further instructed Victim A to (i) ask the responding individuals if they were affiliated with law enforcement; (ii) make the individuals put money on the table before any sex act occurred; and (iii) make the individuals get undressed before Victim A got undressed. GRAY also told Victim A that he would protect Victim A, and that Victim A was safe. GRAY and EASLEY provided Victim A with condoms to use with individuals who responded to the Advertisement.

15. When Victim A protested, MERTZ directed Victim A to listen to GRAY and EASLEY.

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<sup>2</sup> Motel 1 was located on or around Route 38 in or around Cherry Hill, New Jersey.

16. While at Motel 1, Victim A observed GRAY in possession of a firearm. Victim A also observed a collapsible nightstick in the room.

17. That evening, at least one individual came to Motel 1 in response to the Advertisement. At the end of the evening, the defendants dropped Victim A off at a residence in or around Gloucester City, New Jersey. The defendants instructed Victim A not to tell anyone what had happened in Motel 1, or their real names. The defendants also told Victim A, in sum and substance, that if Victim A alerted law enforcement there would be repercussions, which Victim A understood to be a threat of bodily harm. GRAY again told Victim A that he would protect Victim A, but that if Victim A broke the rules he would not do so.

March 3, 2015

18. The next day, on or about March 3, 2015, EASLEY called Victim A and arranged to pick Victim A up. Thereafter, MERTZ picked Victim A up in his vehicle and took Victim A, GRAY, and EASLEY to a motel in or around Mount Laurel, New Jersey ("Motel 2"). GRAY rented a room on the first floor of Motel 2, and MERTZ rented a room on the second floor of Motel 2.

19. While at Motel 2, EASLEY took photographs of Victim A partially clothed and in sexually provocative poses. Using her cell phone, EASLEY uploaded the photographs to the Advertisement. The Advertisement was modified so that the heading read: "Fantasy 80\$ special INCALLS ONLY - 21." The solicitation set forth in paragraph 10, above, remained in the Advertisement. The Advertisement also continued to list the number to EASLEY's Cell Phone as the contact number for individuals responding to the Advertisement.

20. Thereafter, EASLEY and GRAY informed Victim A that someone was on his way to Motel 2, and instructed Victim A to (i) do whatever the individuals responding to the Advertisement wanted; (ii) ask if the individuals were affiliated with law enforcement; (iii) make sure that the individuals put money on the table before any sex acts occurred; (iv) make the individuals get undressed before Victim A got undressed; and (v) say that Victim A was over the age of 18, if asked.

21. EASLEY walked Victim A to the room that MERTZ had rented. When the first individual responding to the Advertisement knocked on the door, EASLEY answered, accepted money from the man, and then left the motel room. In exchange for the money that EASLEY had accepted from the man, Victim A had sexual intercourse with him.



22. Additional individuals responding to the Advertisement came to Motel 2. At the defendants' direction, Victim A engaged in commercial sex acts with several of these individuals and, in exchange, GRAY and/or EASLEY accepted money from them.

23. Later that evening, the defendants told Victim A that they were taking Victim A to Atlantic City, New Jersey, to meet another individual who had responded to the Advertisement. When Victim A refused, GRAY took a firearm from the nightstand, placed it on the bed, and told Victim A that Victim A was going. Victim A complied, and got in MERTZ's vehicle with the defendants.

24. MERTZ cleaned up the motel rooms, collecting trash and the unused condoms that the defendants had provided to Victim A.

25. MERTZ then began to drive the defendants, in MERTZ's vehicle, to Atlantic City. Once inside MERTZ's vehicle, the defendants agreed to let Victim A stop at a residence (the "Residence") in or around Gloucester City, New Jersey, before proceeding to Atlantic City. When they arrived at the Residence, Victim A went inside and contacted the police.

26. Officers of the Gloucester City Police Department responded to the Residence. When they arrived, the officers observed the defendants sitting in the passenger compartment of MERTZ's vehicle outside the Residence. The officers ordered the defendants out of MERTZ's vehicle and recovered a collapsible nightstick after observing it in plain view inside MERTZ's vehicle.

27. The officers went inside the Residence to speak with Victim A. Victim A advised the officers, among other things, that the black male in the vehicle (i.e., GRAY) had a gun. The officers detained the defendants and transported them to the Gloucester City Police Department for questioning.

28. Acting upon MERTZ's verbal and written consent, officers searched MERTZ's vehicle and located a loaded black firearm inside the vehicle, close to where GRAY had been sitting when law enforcement officers arrived at the Residence. The firearm was loaded with 12 rounds of ball ammunition and one round of hollow-point ammunition. The firearm later was identified as a Glock .40 caliber pistol, model 27, bearing serial number NWU278, and was determined to have been manufactured outside of the State of New Jersey.

29. Law enforcement officers also observed boxes of condoms and plastic bags containing trash inside MERTZ's vehicle.

30. While at the Gloucester City Police Department, EASLEY sent Victim A two text messages from EASLEY's Cell Phone. The first text message read: "You can have the money babe you didnt have to do that you know he



didn't steal from you." The second text message read: "[The UI] said call him." Victim A understood the second text message to be a threat—specifically, a reference to the UI's physical assault on Victim A, as described in paragraph 6, above.

31. After being advised of and waiving her *Miranda* rights, EASLEY told law enforcement, in sum and substance, that the firearm belonged to, and had been possessed by, GRAY.

32. After being advised of and waiving his *Miranda* rights, MERTZ admitted to law enforcement, in sum and substance, that the collapsible nightstick belonged to him.